RYAN SWANSON
Lawyers since 1897

Ryan, Swanson & Cleveland, PLLC
1201 Third Avenue, Suite 3400
Seattle, WA 98101-3034
206.464.4224 | Fax: 206.583.0359
Toll-free: 1.800.458.5973
www.ryanswansonlaw.com

Jo M. Flannery
Attorney Of Counsel

direct dial 206.654.2241
flannery@ryanlaw.com
Ref. No. 1724000.01/015435.00010

September 28, 2018

Michelle Mullin, Project Manager
U.S. Environmental Protection Agency - Region 10
1200 Sixth Avenue, Suite 900, OCE-084
Seattle, WA 98101

Re: Rainier Commons Phase I Close Out Report - Response to Request for Additional Information

Dear Ms. Mullin,

This letter provides the responses and additional information requested in connection with your review of the Rainier Commons IPWP Phase I Close Out Report. We have reproduced EPA's requests here, with the response to each immediately following.

General Comments/Documentation Needs:

1. EPA Request:

A narrative explanation of waste handling, storage and disposal including a description of where the waste was sent and waste manifests or certificates of disposal.

Response:

Blasting debris, generated during the abatement process was collected inside the Negative Pressure Enclosure (NPE), and then transferred to DOT approved, one cubic yard "supersacks". These containers were then relocated by forklift to Building 15, for storage until shipment.

Building 15 is a two-story fully enclosed warehouse, which is both weatherproof and secure. The storage area inside the warehouse included a secondary containment area consisting of a continuous layer of 6-mil poly over a perimeter barrier constructed of straw waddles.

Transportation was arranged through Waste Management Inc. who utilized a combination of trucks and rail to deliver the waste materials to their final destination. The initial 27 supersacks were shipped to Columbia Ridge Landfill in Arlington, Oregon on October 16, 2014. On November 26, 2014, six 55-gallon

drums of waste water generated during asphalt cleanup were shipped to Chemical Waste Management in Arlington, Oregon. The final shipment of two 55-gallon drums and one supersack were shipped to Chemical Waste Management in Arlington, Oregon on December 9, 2014.

Shipping manifests and Bills of Lading were included at Exhibit 6 of the Phase One Close-out Report.

2. EPA Comment:

We did not see a description of the removal process, key operating parameters for media blasting as applied to each substrate material and any sub-sections. Please explain or provide such information, or identify where such information is in the submission.

Response:

Phase I work was conducted per the descriptions and removal process in the approved IPWP for Phase I, as stated in paragraph 2 of the Close-Out Report. The paint removal process consisted of a combination of abrasive blasting, followed by the use of hand tools, in this case small, hand-held grinders. All removal work was performed within the negative air containment. Key operating parameters for both processes were results based, in that the application of either process was not governed by factors such as blasting pressure, nozzle size, distance from substrate, or similar measures. The overarching parameter applied to both processes was to adjust as necessary in each area to achieve a result of 100 percent paint removal. This result was confirmed by the independent inspections conducted by NVL. The visual clearance inspection reports are included with the Phase I Close Out Report at Exhibit 1. Secondary parameters, such as damage to the underlying substrate (e.g. loss of mortar, brick surface) as a result of abatement work were considered, but were found to be in conflict with the overarching parameter, which was given priority. Persons performing the removal work were HAZWOPER certified and given discretion in determining equipment and operating parameters, within the scope of the approved IPWP, to best achieve 100 percent paint removal.

3. EPA Request:

We did not see information concerning construction, maintenance and operation parameters. Please explain or provide such information, or identify where such information is in the submission.

Response:

The Close Out Report affirms in paragraph 1 and 2 of the report that the work was performed pursuant to and performed as documented in the approved general

Work Plan and the approved IPWP for Phase I. Our intent was to incorporate those documents by reference, to avoid the need to repeat and reproduce the many details and exhibits in those documents. The general construction procedures submitted as part of the Phase One Individual Phased Work Plan (IPWP), Exhibit 2, pages 4 and 5; as well as the Containment Section sketch provided as Exhibit 6 were utilized. The 4x4 Cant, depicted on the Containment Section was not needed to form the outer floor/wall corner, and was therefore eliminated.

After construction, each Negative Pressure Enclosure (NPE) was fitted with the appropriate quantity of Negative Air Machines (NAM) to supply a minimum of 0.02 inches of negative differential air pressure. A three-stage decontamination unit was established at each NPE for both personnel and equipment use.

Prior to the start of blasting operations, each NPE was independently inspected and cleared for use by NVL Laboratories.

4. EPA Comment/Request:

We were unable to open the documents for exhibit 11b, c, d, e, g, h, i, j. Can you please verify they are accessible on your end and resubmit?

Response:

All of these documents are accessible and were readable on the CD submitted with the original copy of the report, prior to submission. We recently provided an additional electronic copy of the report to EPA. We are including a courtesy copy of those documents with this response for your ease of reference.

The following are questions we would like responses to:

1. EPA Question:

Were pre-clearance and post-clearance substrate samples collected at the same locations?

Answer:

Yes, all sample sets were co-located. With the exception of the sandstone testing, all pre and post samples were located within a six inch diameter circle of each other. For esthetic purposes, the sandstone samples were spaces approximately 10 inches apart.

2. EPA Question (three sub-parts):

   a. Is there a post-clearance sample for building 10-west?

b. It appears that building 11-west pre-clearance was 2.9 ppm in concrete, and post-clearance it was 1.1 in sandstone. Please explain.

c. Lab report does not match in total sample number to tables included in letter (only 6 samples in the attached lab report - but 7 pre-clearance samples, and 6 post-clearance samples). Please explain.

Answers:

a. Buildings 10 and 11 share a common front façade, consisting of brick, concrete, and sandstone. They are also internally connected across all common floors. Therefore, while they have two building numbers on our footprint plan, they are and so we treated them as one functional building for purposes of the remediation. Blasting operations occurred on both buildings 10 and 11 simultaneously. The pre and post clearance sampling for sandstone substrate representing both buildings' 10/11 facade were both collected from "Building 11". The pre-clearance sample identified as 10914-BULK-2 was incorrectly marked as being collected from Building 10 and should be corrected to accurately reflect a sample location of Building 11.

A pre-clearance sample, representing the concrete substrate from Buildings 10 and 11 was collected on June 29, 2014 (Sample # Bldg-11West). A post-clearance concrete sample for these buildings has not been located. Therefore, an additional bulk sample was collected on July 17, 2018. The post-clearance sample was co-located with the original sample. Sample results indicate Non-Detect for PCBs. See Laboratory report attached.

b. See response to a. above.

c. See a. above. Also, Exhibit 2 contains 14 sample reports. One of the samples from October 9, 2014 is not a substrate sample, 10914-Bulk 1, so it is not in the substrate sample tables. We wanted to analyze the blue paint. The blue paint sample was collected at the same time as a substrate sample so its results are on the 21 pages of lab reports. The chain of custody sheet shows it was blue paint. Exhibit 2 of Close Out Report.

3. EPA Question:

EPA was told that some kind of sealant would be applied on top of the brick. Did that occur and if so please provide a summary explanation of what was done?

Answer:

No post-abatement coating work has yet been performed on the Phase I areas. Post-abatement coating, either with a brick sealant, paint or other coating is

outside the scope of the IPWP and RBDA. Rainier Commons cannot make any long term maintenance, restoration, or aesthetic plan for the abated surfaces until EPA provides its formal acceptance of the reports confirming clearance of the abated surfaces. After written approval of the abatement work, Rainier Commons will make its determinations regarding any follow-up aesthetic work be it a natural brick look sealant, other coating, or combination thereof. The abated areas are all Low Occupancy Areas, pursuant to 40 C.F.R. 761.3. Rainier Commons remediated all areas to well below the unrestricted Low Occupancy Area standard, ≤25 ppm, and in almost all cases (only two substrate samples within a few hundredth of the High Occupancy 1 ppm at 1.1 ppm and 1.6 ppm) to below the unrestricted High Occupancy standard[1], when not achieving outright non-

[1] *High occupancy area* means any area where PCB remediation waste has been disposed of on-site and where occupancy for any individual not wearing dermal and respiratory protection for a calendar year is: 840 hours or more (an average of 16.8 hours or more per week) for non-porous surfaces and 335 hours or more (an average of 6.7 hours or more per week) for bulk PCB remediation waste. Examples could include a residence, school, day care center, sleeping quarters, a single or multiple occupancy 40 hours per week work station, a school class room, a cafeteria in an industrial facility, a control room, and a work station at an assembly line. 40 C.F.R. 761.3

Low occupancy area means any area where PCB remediation waste has been disposed of on-site and where occupancy for any individual not wearing dermal and respiratory protection for a calendar year is: less than 840 hours (an average of 16.8 hours per week) for non-porous surfaces and less than 335 hours (an average of 6.7 hours per week) for bulk PCB remediation waste. Examples could include an electrical substation or a location in an industrial facility where a worker spends small amounts of time per week (such as an unoccupied area outside a building, an electrical equipment vault, or in the non-office space in a warehouse where occupancy is transitory). 40 C.F.R. 761.3

(i) *Bulk PCB remediation waste*. Bulk PCB remediation waste includes, but is not limited to, the following non-liquid PCB remediation waste: soil, sediments, dredged materials, muds, PCB sewage sludge, and industrial sludge [porous-surface waste utilizes these standards as well].

(A) High occupancy areas. The cleanup level for bulk PCB remediation waste in high occupancy areas is ≤1 ppm without further conditions. High occupancy areas where bulk PCB remediation waste remains at concentrations >1 ppm and ≤10 ppm shall be covered with a cap meeting the requirements of paragraphs (a)(7) and (a)(8) of this section.

(B) Low occupancy areas.

(1) The cleanup level for bulk PCB remediation waste in low occupancy areas is ≤25 ppm unless otherwise specified in this paragraph.

(2) Bulk PCB remediation wastes may remain at a cleanup site at concentrations >25 ppm and ≤50 ppm if the site is secured by a fence and marked with a sign including the ML mark.

(3) Bulk PCB remediation wastes may remain at a cleanup site at concentrations >25 ppm and ≤100 ppm if the site is covered with a cap meeting the requirements of paragraphs (a)(7) and (a)(8) of this section. 40.C.F.R. 761.61

detect results. Moreover, the abated areas are solid, vertical surfaces, unlike soil or other mobile media to which these standards also apply.

4. EPA Question:

All aqueous results in the catch basins were above the KC discharge limit. What if anything was done to address this?

Answer:

The statement within this question does not appear to be correct, based upon the laboratory sampling data. Of the 12 aqueous samples collected from catch basins and/or manholes discussed in the Phase One Close-Out Report, 6 samples returned lab results with non-detectable levels of PCBs. The remaining 6 samples report PCB levels exceeding the Screening Limit of 0.1 ug/L. The Screening Level applied at this campus was established as the laboratory testing procedure's Method Detection Limit (MDL). The logic for this decision is to have the Screening level act as an "early warning indicator" of possible changes to our Site Source Control processes. Each Screening Level exceedance did trigger an immediate evaluation and review of our Site Source Control procedures, to ensure Best Management Practices were in place and fully utilized.

These Screening Level exceedances were reported to the EPA via email, along with corrective action steps to prevent future exceedances. Examples of these notifications are attached for your ease of reference.

5. EPA Question:

Explain the 13.2 ug/100cm2 result on the windowsill in building 11-200 on January 24, 2015 and any procedures taken afterwards.

Answer:

Background levels of PCBs in dust vary at Rainier Commons as documented by EPA and Department of Health. While no evidence of an actual breach of containment could be correlated with that sample and months had passed between cessation of abatement work and EPA's collection of the sample, Rainier Commons treated the area as a "spill". 40 CFR 761.125(b)(1)(i) provides decontamination requirements for low-concentration spills of PCBs. This section states that solid surfaces must be double washed/rinsed (as defined by 40 CFR 761.123). If the area is an indoor, residential surface, it must be cleaned to 10ug/100cm2. Building 11-200 is not a residential space.

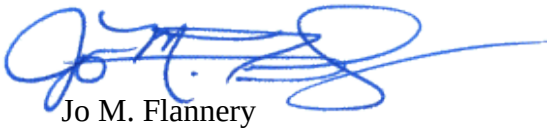
Nonetheless, on January 23, 2015, the window sills in unit 11-200 received a double wash/rinse, thus complying with 40 CFR 761.125 decontamination requirements. Field notes for this date are included in the Field Notes section of

the Close-Out report. A copy has been attached to this response, for your ease of reference.

We trust this correspondence and the attachments address the questions presented and that EPA's approval of the Phase I IPWP Close Out Report will be forthcoming shortly.

Very truly yours,

RYAN, SWANSON & CLEVELAND, PLLC



Jo M. Flannery
Attorney Of Counsel

JMF:rw
Enclosure
cc: Alex Fidis, EPA Regional Counsel

Rainier Commons LLC

Catch Basin Sampling Source Control Action Report

September 5th, 2014

Michelle Mullin, EPA Project Manager:

Pursuant to Condition 6 of the Work Plan approval for the exterior paint abatement work at Rainier Commons and the corresponding Catch Basin Sampling Plan in the IPWP for the Phase I work, and as requested in your August 13, 2014 email, we commissioned NVL Labs to collect additional samples of sediment and water during blasting operations. The sample results and reports are attached.

The sample results exceed our action trigger for PCBs at 0.1 µg/L for aqueous samples and 1 ppm for sediments.

Upon receipt of the samples, Rainier Commons initiated an immediate review and inspection of the site's containment enclosures. The containment enclosures were found to be sealed in all respects and were performing.

Manometer monitoring, analytical air sampling, particulate monitoring, and daily ongoing oversight inspections all indicate that materials in catch basin samples are not escaped blasting media.

There have been no signs of visible dust emanating from either enclosure, no observed track-outs of any kind, and proper decontamination procedures and facilities are in place and properly used. Notwithstanding the above, and in addition to our regular source control activities, Rainier Commons undertook and is undertaking the following additional steps in response to the sampling results.

Recent actions taken include:

1. Catch Basin 15 and Manhole 8 located in the Courtyard, which flow into Manhole 6 were cleaned on September 4th, 2014 (Exhibit B).

2. Cleaning CB2, CB3 and CB4 from sediments and water is scheduled for Monday, September 8th, 2014. CB2 and CB4 flow into CB3.

3. Replacing all existing filter socks on the west side including the secondary layer is scheduled for next week. The following CB included: CB1, CB2, CB3 and CB4(on September 4th we replaced secondary layer).

4. Installing new "Catch All" for CB1 and CB2. (Exhibit C)

5. The mislabeling of CB12 on MSI reports was acknowledge by MSI and will be reflect on new reports starting the week of August 18th, 2014. (Exhibit D)

6. Continuing to inspect, maintain, adjusted and/or replace filter socks in each catch basin as well as on roof drains. Done on a weekly basis or/and as needed.

7. Clean up of the premises by visual inspection for debris including detached paint chips via shop vacuum and hand collection. In addition to our weekly power sweep by MSI trucks including the court yard area.

8. Shop vac courtyard/breezeway area with HEPA filter and continue collecting paint chips by hand as well on a weekly basis.

Vered Mizrahi
Rainier Commons LLC

From: Vered <Vered@arieldevelopment.com>
To: Mullin, Michelle <Mullin.Michelle@epa.gov>
Subject: Phase I - Follow up Catch Basin Report
Date: Fri, Oct 10, 2014 3:16 pm
Attachments: Enhanced Site Source Control Actions 10.10.14.pdf (237K),
RC Catch Basin Sampling- IPWP1 Follow Up Phase 10.10.14.pdf (1167K)

Michelle,
Attached is the follow up catch basin sampling report and a summary of additional site source control work. We are planning to collect one more follow up sample after the next solid rain as all of the site source control work had not been fully carried out prior to this last round of sampling and the amount of water in the Manhole 6 was not much. We will provide that follow up sampling result to you as well. We are very interested to see if the additional work was effective as it appears that it is inputs to Manhole 6 that are at issue. Catch basin 3 is non-detect.

Thank you,

Vered Mizrahi
Rainier Commons LLC
918 S. Horton Street, Suite 1018 | Seattle, WA 98134
C: (206) 948-2821 | **T:** (206) 447-0263 | **F:** (206) 447-0299
vered@arieldevelopment.com | www.arieldevelopment.com

Enhanced Site Source Control Actions

October 10, 2014

A focus on roofs as areas that would benefit from additional site source control measures where they contain direct inputs to the stormwater collection system resulted in the following additional actions. Beginning September 15, 2014, a four-man crew has worked nearly full time performing additional Site Source Control activities, including:

- Multiple rounds of cleaning and vacuuming on the roofs of Buildings 24, 1, 2, 3, 26, 5A, 22, 25, 6, 7, 18, 9, 14, and 15.
- Installed/replaced roof drain filters on all roofs cleaned
- Ongoing change-out of roof filters, daily, during rain events
- Multiple cycles of hand vacuuming the parking lot and courtyard with hepa-filter vacuums
- Catch Basins 1-4 cleaned of sediments on September 8, 2014 and September 25, 2014
- Hand removal and disposal of flaking paint from accessible areas of exterior walls

The above actions represent the expenditure of approximately 450 additional man-hours (since September 15th) above our baseline Source Control activities.

July 19, 2018

Mr. Doug Lansing

Rainier Commons
918 S. Horton Street, Suite 101
Seattle, WA 98134

Re: **NVL Batch 1813540.00**

Project Name/Number: N-A

Project location: 3100 Airport Way S. Seattle, WA 98021

Dear Mr. Lansing,

Enclosed please find test results for samples submitted to our laboratory for analysis. Preparation and analysis of these samples were conducted in accordance with published industry standards and methods specified on the attached analytical report.

The content of this package consists of the following:

-Case Narrative & Definition of Data Qualifiers
-Analytical Test Results
-Applicable QC Summary
-Client Chain-of-Custody (CoC)
-NVL Receiving Record

The report is considered highly confidential and will not be released without your approval. Samples are archived for two weeks following analysis. Samples that are not retrieved by the client will be discarded after two weeks.

Thank you for using our laboratory services. If you need further assistance, please contact us at 206-547-0100 or 1-888-NVLLABS.

Sincerely,

Nick Ly, Technical Director

Enclosure: Sample Results

Case Narrative:

The following summarizes samples received on date as shown on the accompanied Chain of custody by NVL Laboratories, Inc. from Rainier Commons, LLC for Project Location 3100 Airport Way S. Seattle, WA 98021. Samples were logged in for PCB analysis per client request using both customer sample ID's and laboratory assigned ID's as listed on the Chain-of-Custody (CoC). All samples as received were processed and analyzed within specified turnaround time without any abnormalities and deviations that may affect the analytical results. All quality control requirements were acceptable unless stated otherwise. The conditions of all samples were acceptable at time of receipt and all samples submitted with this batch were analyzed unless stated otherwise on the CoC.

Test Results are reported based on dry weight in micrograms per kilograms (mg/kg) for PCB samples as shown on the analytical reports.

NVL Laboratories, Inc.
4708 Aurora Ave N, Seattle, WA 98103
p 206.547.0100 | f 206.634.1936 | www.nvllabs.com

Definition Appendix

Terms

% Rec	Percent recovery.
<	Below Reporting Limit(RL) or Limit of Quantitation(LoQ) of the instrument.
B	Blank contamination. The recorded results is associated with a contaminated blank.
DF	Dilution Factor
J	The reported concentration is an estimated value because something may be present in the sample that interfered with the analysis.
J1	The reported concentration is an estimated value because the laboratory control sample (LCS) is out of control limits.
J2	The reported concentration is an estimated value because the percent recovery for matrix spike is out of control limits.
J3	The reported concentration is an estimated value because the relative percent difference(RPD) for duplicate analysis is out of control limits.
J4	Percent recovery is outside of established control limits.
LCS	Laboratory Control Sample.
LFS	Laboratory Fortified Spike
Limits	The upper and lower control limits for spike recoveries.
LN	Quality control sample is outside of control limits. This analyte was not detected in the sample.
LOQ	Limit of quantitation(same as RL)
mg/kg	Milligrams per kilogram.
ND	Analyte not detected or below the reporting limit of the instrument or methodology

NVL Laboratories, Inc.
4708 Aurora Ave N, Seattle, WA 98103
p 206.547.0100 | f 206.634.1936 | www.nvllabs.com

Definition Appendix

Terms

PPM	Parts per Million.
QC Batch Group	Quality Control Batch Group. The entity that links analytical results and supporting quality control results.
R	The data are not reliable due to possible contamination or loss of material during preparation or analysis. Re-sampling and reanalysis are necessary for verification.
RL	Reporting Limit. The minimum concentration that can be quantified under routine operating conditions.
RPD	Relative Percent Difference. The relative difference between duplicate results(matrix spike, blank spike, or samples duplicate) expressed as a percentage.
RPD Limit	The maximum RPD allowed for a set of duplicate measurements(see RPD).
SMI	Surrogate has matrix interference.
Spike Conc.	The measured concentration, in sample basis units, of a spiked sample.
SURR-ND	Surrogate was not detected due to matrix interference or dilution.
ug/m3	Micrograms per cubic meter.
ug/mL	Micrograms per milliliter
mg/Kg	milligram per kilogram

NVL Laboratories, Inc.
4708 Aurora Ave N, Seattle, WA 98103
p 206.547.0100 | f 206.634.1936 | www.nvllabs.com

ANALYSIS REPORT

Polychlorinated Biphenyls by Gas Chromatography

Client	**Rainier Commons**	Samples Received*	**1**
SDG Number	**1813540.00**	Analyzed By	**Aaron Brown**
Date Reported	**07/19/2018**	Samples Analyzed*	**1**
Project Number	**N-A**	Analysis Method	**8082A**
Location	**3100 Airport Way S. Seattle, WA 98021**	Preparation Method	**3546PR (PCB)**

* for this test only

Sample Number	**71718-DL-PCB**	Received	07/17/2018
Lab Sample ID	18069580	Matrix	Material
Initial Sample Size	2.049 gm	Units of Result	mg/Kg, as received

Analyte	RL	Final Result	Analysis Date
Aroclor-1016	0.98	< 0.98	07/17/2018
Aroclor-1221	0.98	< 0.98	07/17/2018
Aroclor-1232	0.98	< 0.98	07/17/2018
Aroclor-1242	0.98	< 0.98	07/17/2018
Aroclor-1248	0.98	< 0.98	07/17/2018
Aroclor-1254	0.98	< 0.98	07/17/2018
Aroclor-1260	0.98	< 0.98	07/17/2018
PCBs, Total	**0.98**	**<0.98**	

NVL Laboratories, Inc.
4708 Aurora Ave N, Seattle, WA 98103
p 206.547.0100 | f 206.634.1936 | www.nvllabs.com

Quality Control Results

Project Number:	**N-A**	**SDG Number:**	**1813540**
		Project Manager:	**Doug Lansing**
QC Batch(es):	**Q786**	Analysis Method:	**8082A**
QC Batch Method:	3546PR (PCB)	Analysis Description:	Polychlorinated Biphenyls by Gas Chromatography
Preparation Date:	07/17/2018		

Blank: MBLK-1813540

Analyte	Blank Result	Units	DF	RL		Control Limit	Qualifiers
Aroclor-1016	ND	mg/Kg	1	1.0		1	
Aroclor-1221	ND	mg/Kg	1	1.0		1	
Aroclor-1232	ND	mg/Kg	1	1.0		1	
Aroclor-1242	ND	mg/Kg	1	1.0		1	
Aroclor-1248	ND	mg/Kg	1	1.0		1	
Aroclor-1254	ND	mg/Kg	1	1.0		1	
Aroclor-1260	ND	mg/Kg	1	1.0		1	
PCBs, Total	ND	mg/Kg	1	1.0		1	
Surrogates:					% Rec		
Tetrachloro-m-xylene			1		117	40-140	
Decachlorobiphenyl			1		113	40-140	

Lab Control Sample: LCS-1254-1813540

Analyte	Blank Spike Result	Units	DF	Spike Conc.	% Rec	% Rec Limits	Qualifiers
Aroclor-1254	14.6	mg/Kg	1	20.0	73	40-140	
Surrogates:							
Tetrachloro-m-xylene			1		110	40-140	
Decachlorobiphenyl			1		75	40-140	

Lab Control Sample: LCS-1016+1260-1813540
Lab Control Sample Duplicate: LCS Dup-1813540

Analyte	Blank Spike Result	Units	DF	Spike Conc.	% Rec	Limits	RPD	RPD Limit	Qualifiers
Aroclor-1260	15.8	mg/Kg	1	20.0	79	40-140			
	18.3			20.0	91	40-140	15	50	
Surrogates:									
Tetrachloro-m-xylene			1		83	40-140			
					77	40-140			
Decachlorobiphenyl			1		77	40-140			
					97	40-140			

NVL Laboratories, Inc.
4708 Aurora Ave N, Seattle, WA 98103
p 206.547.0100 | f 206.634.1936 | www.nvllabs.com

Surrogate Recovery Summary Report

Client Rainier Commons **SDG Number** 1813540

Project N-A

Customer Sample ID	Lab Sample ID	Analyte	Recovery	Limits
71718-DL-PCB	18069580	Decachlorobiphenyl	54%	40-140
71718-DL-PCB	18069580	Tetrachloro-m-xylene	43%	40-140
LCS Dup-1813540	LCS Dup-1813540	Decachlorobiphenyl	97%	40-140
LCS Dup-1813540	LCS Dup-1813540	Tetrachloro-m-xylene	77%	40-140
LCS-1016+1260-1813540	LCS-1016+1260-1813540	Decachlorobiphenyl	77%	40-140
LCS-1016+1260-1813540	LCS-1016+1260-1813540	Tetrachloro-m-xylene	83%	40-140
LCS-1254-1813540	LCS-1254-1813540	Decachlorobiphenyl	75%	40-140
LCS-1254-1813540	LCS-1254-1813540	Tetrachloro-m-xylene	110%	40-140
MBLK-1813540	MBLK-1813540	Decachlorobiphenyl	113%	40-140
MBLK-1813540	MBLK-1813540	Tetrachloro-m-xylene	117%	40-140

* Recovery outside limits

NVL Laboratories, Inc.
4708 Aurora Ave N, Seattle, WA 98103
p 206.547.0100 | f 206.634.1936 | www.nvllabs.com

INITIAL AND CONTINUING CALIBRATION VERIFICATION

SDG No: **1813540** Contract:

Determination: **8082 PCB Aroclors <Material>**

Run	Sample	Source	Analyzed	Analyte	True	Found	Unit	% Rec	Limits
R000779	CCV1 1016-1260	PCB_2017-1-2	07/17/2018	Aroclor-1016	5	5	ug/mL	100	80-120
		PCB_2017-1-2	07/17/2018	Aroclor-1260	5	5	ug/mL	100	80-120
	CCV1 1254	PCB_2017-1-3	07/17/2018	Aroclor-1254	5	5	ug/mL	100	80-120
	ICV 1016-1254-1260	PCB_2017-1-4	07/17/2018	Aroclor-1016	5	5.609	ug/mL	112	85-115
		PCB_2017-1-4	07/17/2018	Aroclor-1254	5	5.643	ug/mL	113	85-115
		PCB_2017-1-4	07/17/2018	Aroclor-1260	5	5.666	ug/mL	113	85-115
	CCV2 1016-1260	PCB_2017-1-2	07/17/2018	Aroclor-1016	5	5.671	ug/mL	113	80-120
		PCB_2017-1-2	07/17/2018	Aroclor-1260	5	5.958	ug/mL	119	80-120
	CCV2 1254	PCB_2017-1-3	07/17/2018	Aroclor-1254	5	5.97	ug/mL	119	80-120

% Rec = Percent recovery

* = Percent recovery not within control limits

ORGANICS LABORATORY SERVICES

NVL LABS

Company	Rainier Commons, LLC	**NVL Batch Number**	**1813540.00**
Address	918 S. Horton Street, Suite 101 Seattle, WA 98134	**TAT**	2 Days **AH** No
		Rush TAT	
Project Manager	Mr. Doug Lansing	**Due Date**	7/19/2018 **Time** 2:25 PM
Phone	(206) 447-0263	**Email**	lansinghomes@aol.com
Cell	(206) 963-6656	**Fax**	(206) 447-0299

Project Name/Number: N-A **Project Location:** Same

Subcategory Quantitative analysis

Item Code ORG-05 **Method** 8082 PCB Aroclors <Bulk>

Total Number of Samples 1 Rush Samples

	Lab ID	Sample ID	Description	A/R
1	18069580	71718-DL-PCB		A

	Print Name	Signature	Company	Date	Time
Sampled by	Client				
Relinquished by	Client				

Office Use Only	Print Name	Signature	Company	Date	Time
Received by	Sunny Joshi		NVL	7/17/18	1425
Analyzed by	Ann Bom		NVL	7/18/18	13:00
Results Called by					
☐ **Faxed** ☐ **Emailed**					

Special Instructions:

Entered By: Sunny Joshi Date: 7/17/2018 Time: 2:26 PM 1 of 1

4708 Aurora Ave North, Seattle, WA 98103 | p 206.547.0100 | f 206.634.1936 | www.nvllabs.com

RCLLC 0007108

1813540

NVL Laboratories, Inc.
4708 Aurora Ave N, Seattle, WA 98103
Tel: 206.547.0100 Emerg.Pager: 206.344.1878
Fax: 206.634.1936 1.888.NVL.LABS (685.5227)

CHAIN of CUSTODY SAMPLE LOG

NVL LABS

Client RAINIER COMMONS
Street 3100 AIRPORT WAY S. SEATTLE, WA 98021
Project Manager DOUG LANSING
Project Location SAME

NVL Batch Number
Client Job Number
Total Samples ONE
Turn Around Time ☐ 1-Hr ☐ 24-Hrs ☐ 4 Days ☐ 2-Hrs ☒ 2 Days ☐ 5 Days ☐ 4-Hrs ☐ 3 Days ☐ 6 to 10 Days
Please call for TAT less than 24 Hrs.

Phone: 206·963·6656 Fax: Home
Email address (b) (6)

☐ Asbestos Air	☐ PCM (NIOSH 7400)	☐ TEM (NIOSH 7402)	☐ TEM (AHERA)	☐ TEM (EPA Level II)	☐ Other	
☐ Asbestos Bulk	☐ PLM (EPA/600/R-93/116)	☐ PLM (EPA Point Count)	☐ PLM (EPA Gravimetry)	☐ TEM Bulk		

METALS	Det. Limit	Matrix		RCRA Metals		Other Metals
☐ Total Metals	☐ ppm (AAS)	☐ Air Filter	☐ Paint Chips	☐ Arsenic (As)	☐ All 8	☐ All 3
☐ TCLP	☐ ppb (GFAA)	☐ Drinking water	☐ Paint Chips (Area)	☐ Barium (Ba)	☐ Lead (Pb)	☐ Copper (Cu)
		☐ Dust/wipe	☐ Waste Water	☐ Cadmium (Cd)	☐ Mercury (Hg)	☐ Nickel (Ni)
		☐ Soil		☐ Chromium (Cr)	☐ Selenium (Se)	☐ Zinc (Zn)
					☐ Silver (Ag)	

☒ Other Types of Analysis	☐ Fiberglass ☐ Silica	☐ Nuisance Dust ☐ Respirable Dust	☒ Other (Specify)	PCB BULK

Condition of Package: ☐ Good ☐ Damaged (no spillage) ☐ Severe damage (spillage)

Seq. #	Lab ID	Client Sample Number	Comments	A/R
1		7171B-DL-PCB	BUILDING 11 CONCRETE SUBSTRATE	
2				
3				
4				
5				
6				
7				
8				
9				
10				
11				
12				
13				
14				
15				

	Print Below	Sign Below	Company	Date	Time
Sampled by	D. LANSING		R.C.	7/17/18	1210
Relinquished by	YOUNG		R.C.	7/17/18	2:20
Received by	Sunny J		NVL	7.17.18	2:25
Analyzed by	Anne Brown		NVL	7/18/18	13:00
Results Called by					
Results Faxed by					

Special Instructions: Unless requested in writing, all samples will be disposed of two (2) weeks after analysis.

RCLLC 0007109

Rainier Commons Exterior Paint Removal Project

Daily Observations & Activity Report

(Note Date, Report # and Page #on each sheet)

Date: 1-23-15 Daily Report #: PHASE ONE

Notes on Daily Observations and Activities

0930 MOYAD AND CREW (A-ONE GLASS) ARRIVED ON-SITE AND BEGAN REMOVED THE INTERIOR "SOUND-PROOFING" WINDOWS IN UNIT 11-200.

1000 DAVE (NVL LABS) ARRIVED ON-SITE TO OBTAIN WIPES SAMPLES FROM THE WINDOW SILLS IN UNIT 11-200. NOTE: PREVIOUS WIPE SAMPLES INDICATED THE PRESENSE OF PCBs AT A QUANTITY SLIGHLY HIGER THAN 10 ug/100^2.

1005 DAVE WITNESSED THE UNDERSIGNED PERFORMING A REGULATORY "DOUBLE WASH/RINSE" CLEANING UTILIZING ISOPROPYL ALCOHOL, A NEW, UNUSED FIBER BRISTLE BRUSH, AND CLEAN TERRY TOWELS. TOWELS WERE CHANGED BETWEEN EACH WASH/RINSE CYCLE.

1030 DAVE OBTAINED ONE WIPE SAMPLE FROM EACH SILL.

1110 MOYAD BEGAN RE-INSTALLATION OF WINDOWS.

INSPECTOR

1120 ALL MATERIALS USED FOR CLEANING WERE DISPOSED OF IN ON-SITE HAZ-MAT STORAGE BOX.

Signature [signature] **Date** 1-23-15

Daily Observation / Activity Report (Version 1) (6-11-14) Page 1 of 1

- Include reasons for non-satisfactory responses noted in Daily Inspection Checklist
- If referring to any item from Daily Inspection Checklist, give row #
- Submit Daily Inspection Checklist and Daily Observations/Activity Report along with sample submission and data sheets to NVL Labs

3600 Fremont Ave. N.
Seattle, WA 98103
T: (206) 352-3790
F: (206) 352-7178
info@fremontanalytical.com

Construction Group Int'l LLC
Mark Marcell
19407 144th Ave NE, Building D
Woodenville, WA 98072

RE: Rainier Commons
Lab ID: 1409354

October 06, 2014

Attention Mark Marcell:

Fremont Analytical, Inc. received 1 sample(s) on 9/30/2014 for the analyses presented in the following report.

Mercury (SW7470) with TCLP Extraction (EPA 1311)
Metals (SW6020) with TCLP Extraction (EPA 1311)
Polychlorinated Biphenyls (PCB) by EPA 8082

This report consists of the following:

- Case Narrative
- Analytical Results
- Applicable Quality Control Summary Reports
- Chain of Custody

All analyses were performed consistent with the Quality Assurance program of Fremont Analytical, Inc. Please contact the laboratory if you should have any questions about the results.

Thank you for using Fremont Analytical.

Sincerely,

Chelsea Ward
Project Manager

Date: *10/06/2014*

CLIENT: Construction Group Int'l LLC
Project: Rainier Commons
Lab Order: 1409354

Work Order Sample Summary

Lab Sample ID	Client Sample ID	Date/Time Collected	Date/Time Received
1409354-001	Blasting Media	09/30/2014 10:30 AM	09/30/2014 11:25 AM

Note: If no "Time Collected" is supplied, a default of 12:00AM is assigned

Case Narrative

WO#: **1409354**
Date: **10/6/2014**

CLIENT: Construction Group Int'l LLC
Project: Rainier Commons

I. SAMPLE RECEIPT:
Samples receipt information is recorded on the attached Sample Receipt Checklist.

II. GENERAL REPORTING COMMENTS:
Results are reported on a wet weight basis unless dry-weight correction is denoted in the units field on the analytical report ("mg/kg-dry" or "ug/kg-dry").

Matrix Spike (MS) and MS Duplicate (MSD) samples are tested from an analytical batch of "like" matrix to check for possible matrix effect. The MS and MSD will provide site specific matrix data only for those samples which are spiked by the laboratory. The sample chosen for spike purposes may or may not have been a sample submitted in this sample delivery group. The validity of the analytical procedures for which data is reported in this analytical report is determined by the Laboratory Control Sample (LCS) and the Method Blank (MB). The LCS and the MB are processed with the samples and the MS/MSD to ensure method criteria are achieved throughout the entire analytical process.

III. ANALYSES AND EXCEPTIONS:
Exceptions associated with this report will be footnoted in the analytical results page(s) or the quality control summary page(s) and/or noted below.

Analytical Report

WO#: **1409354**
Date Reported: **10/6/2014**

Client: Construction Group Int'l LLC
Collection Date: 9/30/2014 10:30:00 AM
Project: Rainier Commons
Lab ID: 1409354-001
Matrix: Solid
Client Sample ID: **Blasting Media**

Analyses	Result	RL	Qual	Units	DF	Date Analyzed
Polychlorinated Biphenyls (PCB) by EPA 8082				Batch ID: 8934		Analyst: NG
Aroclor 1016	ND	95.5	D	mg/Kg	1000	10/6/2014 9:26:00 AM
Aroclor 1221	ND	95.5	D	mg/Kg	1000	10/6/2014 9:26:00 AM
Aroclor 1232	ND	95.5	D	mg/Kg	1000	10/6/2014 9:26:00 AM
Aroclor 1242	ND	95.5	D	mg/Kg	1000	10/6/2014 9:26:00 AM
Aroclor 1248	ND	95.5	D	mg/Kg	1000	10/6/2014 9:26:00 AM
Aroclor 1254	2,070	95.5	D	mg/Kg	1000	10/6/2014 9:26:00 AM
Aroclor 1260	ND	95.5	D	mg/Kg	1000	10/6/2014 9:26:00 AM
Aroclor 1262	ND	95.5	D	mg/Kg	1000	10/6/2014 9:26:00 AM
Aroclor 1268	ND	95.5	D	mg/Kg	1000	10/6/2014 9:26:00 AM
Surr: Decachlorobiphenyl	121	50.2-159	D	%REC	1000	10/6/2014 9:26:00 AM
Surr: Tetrachloro-m-xylene	116	60.3-134	D	%REC	1000	10/6/2014 9:26:00 AM

NOTES:
Analyte concentration too high for accurate quantitation.

Mercury (SW7470) with TCLP Extraction (EPA 1311)				Batch ID: 8904		Analyst: MW
Mercury	ND	0.00200		mg/L	1	10/2/2014 3:26:36 PM
Metals (SW6020) with TCLP Extraction (EPA 1311)				Batch ID: 8908		Analyst: TN
Arsenic	ND	0.500		mg/L	1	10/2/2014 3:30:38 PM
Barium	ND	5.00		mg/L	1	10/2/2014 3:30:38 PM
Cadmium	ND	0.100		mg/L	1	10/2/2014 3:30:38 PM
Chromium	ND	0.500		mg/L	1	10/2/2014 3:30:38 PM
Lead	1.43	0.500		mg/L	1	10/2/2014 3:30:38 PM
Selenium	ND	1.00		mg/L	1	10/2/2014 3:30:38 PM
Silver	ND	0.100		mg/L	1	10/2/2014 3:30:38 PM

Qualifiers:

B	Analyte detected in the associated Method Blank	D	Dilution was required
E	Value above quantitation range	H	Holding times for preparation or analysis exceeded
J	Analyte detected below quantitation limits	ND	Not detected at the Reporting Limit
RL	Reporting Limit	S	Spike recovery outside accepted recovery limits

Work Order: 1409354
CLIENT: Construction Group Int'l LLC
Project: Rainier Commons

QC SUMMARY REPORT

Mercury (SW7470) with TCLP Extraction (EPA 1311)

Sample ID: **MB-8904**	SampType: **MBLK**	Units: **mg/L**	Prep Date: **10/2/2014**	RunNo: **17192**
Client ID: **MBLKS**	Batch ID: **8904**		Analysis Date: **10/2/2014**	SeqNo: **344062**

Analyte	Result	RL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	RPD Ref Val	%RPD	RPDLimit	Qual
Mercury	ND	0.00200									

Sample ID: **LCS-8904**	SampType: **LCS**	Units: **mg/L**	Prep Date: **10/2/2014**	RunNo: **17192**
Client ID: **LCSS**	Batch ID: **8904**		Analysis Date: **10/2/2014**	SeqNo: **344063**

Analyte	Result	RL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	RPD Ref Val	%RPD	RPDLimit	Qual
Mercury	2.43	0.00200	2.500	0	97.2	70	130				

Sample ID: **1409322-001EDUP**	SampType: **DUP**	Units: **mg/L**	Prep Date: **10/2/2014**	RunNo: **17192**
Client ID: **BATCH**	Batch ID: **8904**		Analysis Date: **10/2/2014**	SeqNo: **344065**

Analyte	Result	RL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	RPD Ref Val	%RPD	RPDLimit	Qual
Mercury	ND	0.00200						0		20	

Sample ID: **1409322-001EMS**	SampType: **MS**	Units: **mg/L**	Prep Date: **10/2/2014**	RunNo: **17192**
Client ID: **BATCH**	Batch ID: **8904**		Analysis Date: **10/2/2014**	SeqNo: **344066**

Analyte	Result	RL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	RPD Ref Val	%RPD	RPDLimit	Qual
Mercury	2.41	0.00200	2.500	0	96.4	70	130				

Sample ID: **1409322-001EMSD**	SampType: **MSD**	Units: **mg/L**	Prep Date: **10/2/2014**	RunNo: **17192**
Client ID: **BATCH**	Batch ID: **8904**		Analysis Date: **10/2/2014**	SeqNo: **344067**

Analyte	Result	RL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	RPD Ref Val	%RPD	RPDLimit	Qual
Mercury	2.36	0.00200	2.500	0	94.4	70	130	2.410	2.10	30	

Qualifiers:

B	Analyte detected in the associated Method Blank	D	Dilution was required	E	Value above quantitation range
H	Holding times for preparation or analysis exceeded	J	Analyte detected below quantitation limits	ND	Not detected at the Reporting Limit
R	RPD outside accepted recovery limits	RL	Reporting Limit	S	Spike recovery outside accepted recovery limits

Work Order: 1409354
CLIENT: Construction Group Int'l LLC
Project: Rainier Commons

QC SUMMARY REPORT

Metals (SW6020) with TCLP Extraction (EPA 1311)

Sample ID: **LCS-8908**	SampType: **LCS**	Units: **mg/L**	Prep Date: **10/2/2014**	RunNo: **17194**
Client ID: **LCSS**	Batch ID: **8908**		Analysis Date: **10/2/2014**	SeqNo: **344105**

Analyte	Result	RL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	RPD Ref Val	%RPD	RPDLimit	Qual
Arsenic	5.03	0.100	5.000	0	101	65	135				
Barium	5.12	0.500	5.000	0	102	65	135				
Cadmium	0.261	0.200	0.2500	0	104	65	135				
Chromium	4.99	0.100	5.000	0	99.8	65	135				
Lead	2.57	0.200	2.500	0	103	65	135				
Selenium	0.549	0.500	0.5000	0	110	65	135				
Silver	0.255	0.200	0.2500	0	102	65	135				

Sample ID: **1409354-001ADUP**	SampType: **DUP**	Units: **mg/L**	Prep Date: **10/2/2014**	RunNo: **17194**
Client ID: **Blasting Media**	Batch ID: **8908**		Analysis Date: **10/2/2014**	SeqNo: **344110**

Analyte	Result	RL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	RPD Ref Val	%RPD	RPDLimit	Qual
Arsenic	ND	0.100						0		30	
Barium	ND	0.500						0		30	
Cadmium	ND	0.200						0		30	
Chromium	ND	0.100						0		30	
Lead	1.43	0.200						1.432	0.0677	30	
Selenium	ND	0.500						0		30	
Silver	ND	0.200						0		30	

Sample ID: **1409354-001AMS**	SampType: **MS**	Units: **mg/L**	Prep Date: **10/2/2014**	RunNo: **17194**
Client ID: **Blasting Media**	Batch ID: **8908**		Analysis Date: **10/2/2014**	SeqNo: **344112**

Analyte	Result	RL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	RPD Ref Val	%RPD	RPDLimit	Qual
Arsenic	5.26	0.500	5.000	0.01791	105	65	135				
Barium	5.47	5.00	5.000	0.2753	104	65	135				
Cadmium	0.334	0.100	0.2500	0.05005	114	65	135				
Chromium	5.07	0.500	5.000	0.03380	101	65	135				

Qualifiers:

B	Analyte detected in the associated Method Blank	D	Dilution was required	E	Value above quantitation range
H	Holding times for preparation or analysis exceeded	J	Analyte detected below quantitation limits	ND	Not detected at the Reporting Limit
R	RPD outside accepted recovery limits	RL	Reporting Limit	S	Spike recovery outside accepted recovery limits

Work Order: 1409354
CLIENT: Construction Group Int'l LLC
Project: Rainier Commons

QC SUMMARY REPORT

Metals (SW6020) with TCLP Extraction (EPA 1311)

Sample ID: **1409354-001AMS**	SampType: **MS**	Units: **mg/L**	Prep Date: **10/2/2014**	RunNo: **17194**
Client ID: **Blasting Media**	Batch ID: **8908**		Analysis Date: **10/2/2014**	SeqNo: **344112**

Analyte	Result	RL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	RPD Ref Val	%RPD	RPDLimit	Qual
Lead	3.95	0.500	2.500	1.432	101	65	135				
Selenium	0.572	1.00	0.5000	0	114	65	135				
Silver	0.257	0.100	0.2500	0	103	65	135				

Sample ID: **1409354-001AMSD**	SampType: **MSD**	Units: **mg/L**	Prep Date: **10/2/2014**	RunNo: **17194**
Client ID: **Blasting Media**	Batch ID: **8908**		Analysis Date: **10/2/2014**	SeqNo: **344114**

Analyte	Result	RL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	RPD Ref Val	%RPD	RPDLimit	Qual
Arsenic	5.48	0.500	5.000	0.01791	109	65	135	5.259	4.14	30	
Barium	5.46	5.00	5.000	0.2753	104	65	135	5.472	0.170	30	
Cadmium	0.332	0.100	0.2500	0.05005	113	65	135	0.3338	0.634	30	
Chromium	5.20	0.500	5.000	0.03380	103	65	135	5.069	2.57	30	
Lead	3.84	0.500	2.500	1.432	96.3	65	135	3.949	2.84	30	
Selenium	0.577	1.00	0.5000	0	115	65	135	0		30	
Silver	0.249	0.100	0.2500	0	99.7	65	135	0.2574	3.18	30	

Sample ID: **MB-8901FB**	SampType: **MBLK**	Units: **mg/L**	Prep Date: **10/2/2014**	RunNo: **17194**
Client ID: **MBLKS**	Batch ID: **8908**		Analysis Date: **10/2/2014**	SeqNo: **344119**

Analyte	Result	RL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	RPD Ref Val	%RPD	RPDLimit	Qual
Arsenic	ND	0.100									
Barium	ND	0.500									
Cadmium	ND	0.200									
Chromium	ND	0.100									
Lead	ND	0.200									
Selenium	ND	0.500									
Silver	ND	0.200									

Qualifiers:

B	Analyte detected in the associated Method Blank	D	Dilution was required	E	Value above quantitation range
H	Holding times for preparation or analysis exceeded	J	Analyte detected below quantitation limits	ND	Not detected at the Reporting Limit
R	RPD outside accepted recovery limits	RL	Reporting Limit	S	Spike recovery outside accepted recovery limits

Work Order: 1409354
CLIENT: Construction Group Int'l LLC
Project: Rainier Commons

QC SUMMARY REPORT

Metals (SW6020) with TCLP Extraction (EPA 1311)

Qualifiers:	B	Analyte detected in the associated Method Blank	D	Dilution was required	E	Value above quantitation range
	H	Holding times for preparation or analysis exceeded	J	Analyte detected below quantitation limits	ND	Not detected at the Reporting Limit
	R	RPD outside accepted recovery limits	RL	Reporting Limit	S	Spike recovery outside accepted recovery limits

Work Order: 1409354
CLIENT: Construction Group Int'l LLC
Project: Rainier Commons

QC SUMMARY REPORT

Polychlorinated Biphenyls (PCB) by EPA 8082

Sample ID: **PCB CCV 1254**	SampType: **CCV**	Units: **mg/Kg**	Prep Date: **10/6/2014**	RunNo: **17231**
Client ID: **CCV**	Batch ID: **8934**		Analysis Date: **10/6/2014**	SeqNo: **344991**

Analyte	Result	RL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	RPD Ref Val	%RPD	RPDLimit	Qual
Aroclor 1254	1.14	0.100	1.000	0	114	80	120				
Surr: Decachlorobiphenyl	52.7		50.00		105	50.2	159				
Surr: Tetrachloro-m-xylene	47.1		50.00		94.2	60.3	134				

Sample ID: **1409354-001ADUP**	SampType: **DUP**	Units: **mg/Kg**	Prep Date: **10/3/2014**	RunNo: **17231**
Client ID: **Blasting Media**	Batch ID: **8934**		Analysis Date: **10/6/2014**	SeqNo: **344993**

Analyte	Result	RL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	RPD Ref Val	%RPD	RPDLimit	Qual
Aroclor 1016	ND	94.1						0		30	D
Aroclor 1221	ND	94.1						0		30	D
Aroclor 1232	ND	94.1						0		30	D
Aroclor 1242	ND	94.1						0		30	D
Aroclor 1248	ND	94.1						0		30	D
Aroclor 1254	2,520	94.1						2,067	19.9	30	D
Aroclor 1260	ND	94.1						0		30	D
Aroclor 1262	ND	94.1						0		30	D
Aroclor 1268	ND	94.1						0		30	D
Surr: Decachlorobiphenyl	58,000		47,040		123	50.2	159		0		D
Surr: Tetrachloro-m-xylene	52,200		47,040		111	60.3	134		0		D

NOTES:
Analyte concentration too high for accurate quantitation.

Sample ID: **PCB CCV 1254**	SampType: **CCV**	Units: **mg/Kg**	Prep Date: **10/6/2014**	RunNo: **17231**
Client ID: **CCV**	Batch ID: **8934**		Analysis Date: **10/6/2014**	SeqNo: **344994**

Analyte	Result	RL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	RPD Ref Val	%RPD	RPDLimit	Qual
Aroclor 1254	1.14	0.100	1.000	0	114	80	120				
Surr: Decachlorobiphenyl	53.4		50.00		107	50.2	159				

Qualifiers:

B	Analyte detected in the associated Method Blank	D	Dilution was required	E	Value above quantitation range
H	Holding times for preparation or analysis exceeded	J	Analyte detected below quantitation limits	ND	Not detected at the Reporting Limit
R	RPD outside accepted recovery limits	RL	Reporting Limit	S	Spike recovery outside accepted recovery limits

Work Order: 1409354
CLIENT: Construction Group Int'l LLC
Project: Rainier Commons

QC SUMMARY REPORT

Polychlorinated Biphenyls (PCB) by EPA 8082

Sample ID: **PCB CCV 1254**	SampType: **CCV**			Units: **mg/Kg**		Prep Date: **10/6/2014**		RunNo: **17231**		
Client ID: **CCV**	Batch ID: **8934**					Analysis Date: **10/6/2014**		SeqNo: **344994**		
Analyte	Result	RL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	RPD Ref Val	%RPD	RPDLimit	Qual
Surr: Tetrachloro-m-xylene	46.8		50.00		93.5	60.3	134				

Sample ID: **MB-8934**	SampType: **MBLK**			Units: **mg/Kg**		Prep Date: **10/3/2014**		RunNo: **17231**		
Client ID: **MBLKS**	Batch ID: **8934**					Analysis Date: **10/3/2014**		SeqNo: **345053**		
Analyte	Result	RL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	RPD Ref Val	%RPD	RPDLimit	Qual
Aroclor 1016	ND	0.100									
Aroclor 1221	ND	0.100									
Aroclor 1232	ND	0.100									
Aroclor 1242	ND	0.100									
Aroclor 1248	ND	0.100									
Aroclor 1254	ND	0.100									
Aroclor 1260	ND	0.100									
Aroclor 1262	ND	0.100									
Aroclor 1268	ND	0.100									
Surr: Decachlorobiphenyl	58.1		50.00		116	50.2	159				
Surr: Tetrachloro-m-xylene	55.9		50.00		112	60.3	134				

Sample ID: **LCS-8934**	SampType: **LCS**			Units: **mg/Kg**		Prep Date: **10/3/2014**		RunNo: **17231**		
Client ID: **LCSS**	Batch ID: **8934**					Analysis Date: **10/3/2014**		SeqNo: **345054**		
Analyte	Result	RL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	RPD Ref Val	%RPD	RPDLimit	Qual
Aroclor 1016	1.05	0.100	1.000	0	105	45.8	133				
Aroclor 1260	1.03	0.100	1.000	0	103	57	134				
Surr: Decachlorobiphenyl	54.3		50.00		109	50.2	159				
Surr: Tetrachloro-m-xylene	54.5		50.00		109	60.3	134				

Qualifiers:

B	Analyte detected in the associated Method Blank	D	Dilution was required	E	Value above quantitation range
H	Holding times for preparation or analysis exceeded	J	Analyte detected below quantitation limits	ND	Not detected at the Reporting Limit
R	RPD outside accepted recovery limits	RL	Reporting Limit	S	Spike recovery outside accepted recovery limits

Work Order: 1409354
CLIENT: Construction Group Int'l LLC
Project: Rainier Commons

QC SUMMARY REPORT

Polychlorinated Biphenyls (PCB) by EPA 8082

Sample ID: **1409354-001AMS** SampType: **MS** Units: **mg/Kg** Prep Date: **10/3/2014** RunNo: **17231**
Client ID: **Blasting Media** Batch ID: **8934** Analysis Date: **10/3/2014** SeqNo: **345057**

Analyte	Result	RL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	RPD Ref Val	%RPD	RPDLimit	Qual
Aroclor 1016	186	0.0931	0.9311	188.5	-316	61.7	139				S
Aroclor 1260	399	0.0931	0.9311	287.2	12,000	63.1	138				S
Surr: Decachlorobiphenyl	198		46.55		425	50.2	159				S
Surr: Tetrachloro-m-xylene	59.7		46.55		128	60.3	134				

NOTES:
S - Outlying surrogate recovery due to matrix interference.
S - Analyte concentration was too high for accurate spike recoveries.

Qualifiers:

B	Analyte detected in the associated Method Blank	D	Dilution was required	E	Value above quantitation range
H	Holding times for preparation or analysis exceeded	J	Analyte detected below quantitation limits	ND	Not detected at the Reporting Limit
R	RPD outside accepted recovery limits	RL	Reporting Limit	S	Spike recovery outside accepted recovery limits

Sample Log-In Check List

Client Name:	**CGI**	Work Order Number:	**1409354**
Logged by:	**Erica Silva**	Date Received:	**9/30/2014 11:25:00 AM**

Chain of Custody

1.	Is Chain of Custody complete?	Yes ☑	No ☐	Not Present ☐
2.	How was the sample delivered?	Client		

Log In

3.	Coolers are present?	Yes ☐	No ☑	NA ☐
		No cooler present		
4.	Shipping container/cooler in good condition?	Yes ☑	No ☐	
5.	Custody seals intact on shipping container/cooler?	Yes ☐	No ☐	Not Required ☑
6.	Was an attempt made to cool the samples?	Yes ☐	No ☑	NA ☐
		Samples received straight from field		
7.	Were all coolers received at a temperature of >0°C to 10.0°C	Yes ☐	No ☐	NA ☑
8.	Sample(s) in proper container(s)?	Yes ☑	No ☐	
9.	Sufficient sample volume for indicated test(s)?	Yes ☑	No ☐	
10.	Are samples properly preserved?	Yes ☑	No ☐	
11.	Was preservative added to bottles?	Yes ☐	No ☑	NA ☐
12.	Is the headspace in the VOA vials?	Yes ☐	No ☐	NA ☑
13.	Did all samples containers arrive in good condition(unbroken)?	Yes ☑	No ☐	
14.	Does paperwork match bottle labels?	Yes ☑	No ☐	
15.	Are matrices correctly identified on Chain of Custody?	Yes ☑	No ☐	
16.	Is it clear what analyses were requested?	Yes ☑	No ☐	
17.	Were all holding times able to be met?	Yes ☑	No ☐	

Special Handling (if applicable)

18.	Was client notified of all discrepancies with this order?	Yes ☐	No ☐	NA ☑

Person Notified: _____ Date: _____

By Whom: _____ Via: ☐ eMail ☐ Phone ☐ Fax ☐ In Person

Regarding: _____

Client Instructions: _____

19. Additional remarks:

Client requested TCLP RCRA-8 metals at sample drop-off.

Item Information

Item #	Temp ºC	Condition
Sample	19.4	

RCLLC 0007122

Fremont Analytical

Chain of Custody Record

3600 Fremont Ave N.
Seattle, WA 98103
Tel: 206-352-3790
Fax: 206-352-7178

Laboratory Project No (internal): 1409354

Date: 9/30/14

Page: _____ of: _____

Client: CGI
Address: 14256 144th Ave NE
City, State, Zip: Woodinville
Tel: 425 487 2618
Reports To (PM):
Fax: 425 487 2619

Project Name: Rainier Commons
Location: Seattle
Collected by: Mark Mancell / Doug Lansing
Email: markm@cgi45.net
Project No:

*Matrix Codes: A = Air, AQ = Aqueous, B = Bulk, O = Other, P = Product, S = Soil, SD = Sediment, SL = Solid, W = Water, DW = Drinking Water, GW = Ground Water, WW = Waste Water

	Sample Name	Sample Date	Sample Time	Sample Type (Matrix)*	VOC (EPA 8260)	GX/BTEX	BTEX	Gasoline Range Organics (GX)	Hydrocarbon Identification (HCID)	Diesel/Heavy Oil Range Organics (DX)	SEMI VOL (EPA 8270)	PAH (EPA 8270 - SIM)	PCBs (EPA 8082)	Metals** (6020 / 200.8) TCLP	Total (T) / Dissolved (D)	Anions (IC)***	EDB (8011)	Comments/Depth
1	Blasting Media	9/30	10:30	Solid										X				
2	(incl. poly tyvek		air															
3	cardboard)																	
4																		
5																		
6																		
7																		
8																		
9																		
10																		

**Metals Analysis (Circle): MTCA-5 RCRA-8 Priority Pollutants TAL Individual: Ag Al As B Ba Be Ca Cd Co Cr Cu Fe Hg K Mg Mn Mo Na Ni Pb Sb Se Sr Sn Ti Tl U V Zn

***Anions (Circle): Nitrate Nitrite Chloride Sulfate Bromide O-Phosphate Fluoride Nitrate+Nitrite

Special Remarks:

Sample Disposal: ☐ Return to Client ☐ Disposal by Lab (A fee may be assessed if samples are retained after 30 days.)

Relinquished	Date/Time	Received	Date/Time
x		x	
x Mark Mancell		x Rene Gren	9/30/14 11:25

TAT -> SameDay^ NextDay^ 2 Day 3 Day STD
^Please coordinate with the lab in advance

Distribution: White - Lab, Yellow - File, Pink - Originator

NVL Laboratories, Inc.
4708 Aurora Ave N, Seattle, WA 98103
p 206.547.0100 | f 206.634.1936 | www.nvllabs.com

Analysis Report
Polychlorinated Biphenyls (PCBs)

NVL LABS INDUSTRIAL HYGIENE SERVICES

Client: Rainier Commons, LLC
Address: 918 S. Horton Street, Suite 101
Seattle, WA 98134

Attention: Mr. Doug Lansing
Project Location: 3100 Airport Way S. Seattle,WA 98134

NVL Batch No. 1411580.00
Method No.: EPA 8082
Client Project #: 2012-494
Date Received: 7/9/2014
Matrix: Bulk
Samples Received: 1
Samples Analyzed: 1

Lab Sample ID:	14071725			
Client Sample ID:	7914 DL PCB1			
Sample Description:	Paint Chips removed from Exterior Window frame, Bldg. 13			
Sample Weight (g)	1.1303			
PCB Type	mg/Kg(ppm)			
Aroclor 1016	ND			
Aroclor 1221	ND			
Aroclor 1232	ND			
Aroclor 1242	ND			
Aroclor 1248	ND			
Aroclor 1254	21000.0			
Aroclor 1260	16000.0			
Total: PCB Concentration	37000.0			
Reporting Limit (RL)	1800.0			

Remarks: mg/Kg = Milligrams per kilograms
ppm = Parts per million by weight
ND = None Detected (less than RL)
<RL = Below the reporting limit of instrument

Sampled by: Client
Analyzed by: Evelyn Ahulu
Date: 07/09/2014

DRAFT

Preparation of these samples were conducted in accordance with EPA Method 3546 or other published test methods as noted in this report. Unless stated otherwise, the condition of all samples was acceptable at time of receipt. Reported sample results are based on dry weight and method QC results are acceptable unless stated otherwise. If samples were not collected by NVL personnel, then the accuracy of the results is limited by the methodology and acuity of the sample collector. This report shall not be reproduced except in full, without written approval of NVL Laboratories, Inc.. Responsibility for interpretation of the reported data rests with the client.

RCLLC 0007124

NVL Laboratories, Inc.
4708 Aurora Ave N, Seattle, WA 98103
Tel: 206.547.0100 Emerg.Cell: 206.914.4646
Fax: 206.634.1936 1.888.NVL.LABS (685.5227)

CHAIN of CUSTODY SAMPLE LOG

NVL Batch ID
1411580

Client Rainier Commons, LLC
Street 918 S. Horton Street, Suite 101
Seattle, WA 98134

Project Manager Mr. Doug Lansing
Project Location 3100 Airport Way S. Seattle,WA 98134

Phone: (206) 447-0263 **Fax:** (206) 447-0299

NVL Batch Number
Client Job Number 2012-494
Total Samples ONE
Turn Around Time ☐ 1-Hr ☐ 2-Hrs ☐ 4-Hrs ☐ 8-Hrs ☐ 12-Hrs ☒ 24-Hrs ☐ 2 ☐ 3 ☐ 4 ☐ 5 ☐ 6-10

Please call for TAT less than 24 Hrs

Email address lansinghomes@aol.com
Cell (206) 963-6656

☐ **Asbestos Air**	☐ PCM (NIOSH 7400)	☐ TEM (NIOSH 7402)	☐ TEM (AHERA)	☐ TEM (EPA Level II)	☐ Other
☐ **Asbestos Bulk**	☐ PLM (EPA/600/R-93/116)	☐ PLM (EPA Point Count)	☐ PLM (EPA Gravimetry)	☐ TEM BULK	
☐ **Mold/Fungus**	☐ Mold Air	☐ Mold Bulk	☐ **Rotometer Calibration**		

METALS	**Det. Limit**	**Matrix**		**RCRA Metals**		**Other Metals**
☐ Total Metals	☐ FAA (ppm	☐ Air Filter	☐ Soil	☐ Arsenic (As)	☐ All 8	☐ **All 3**
☐ TCLP	☐ ICP (ppm)	☐ Drinking water	☐ Paint Chips in %	☐ Barium (Ba)	☐ Chromium (C	☐ Copper (Cu)
☐ Cr 6	☐ GFAA (ppl	☐ Dust/wipe (Area)	☐ Paint Chips in cr	☐ Cadmium (Cd)	☐ Lead (Pb)	☐ Nickel (Ni)
					☐ Mercury (Hg)	☐ Zinc (Zn)

☒ **Other Types of Analysis** ☐ Fiberglass ☐ Silica ☐ Nuisance Dust ☐ Respirable Dust ☒ Other (Specify) PCB-BULK

Condition of Package: ☐ Good ☐ Damaged (no spillage) ☐ Severe damage (spillage)

Seq. #	Lab ID	Client Sample Number	Comments (e.g Sample are, Sample Volume, etc)	A/R
1		7914 DL PCBL	PAINT CHIPS REMOVED FROM EXTERIOR	
2			WINDOW FRAME, BLDG 13.	
3				
4				
5				
6				
7				
8				
9				
10				
11				
12				
13				
14				
15				

	Print Below	Sign Below	Company	Date	Time
Sampled by	LARRY MIDDAUGH		CGI	7/9/14	
Relinquished by	DOUG LANSING		R.C.	7/9/14	
Received by	SHASTA KHAN		NDM	7/9/14	840 AM
Analyzed by					
Results Called by					
Results Faxed by					

Special Instructions: Unless requested in writing, all samples will be disposed of two (2) weeks after analysis.

NVL Laboratories, Inc.
4708 Aurora Ave. N., Seattle, WA 98103
Tel: 206.547.0100, Fax: 206.634.1936
www.nvllabs.com

Analysis Report

AIHA - IH # 101861
WA - DOE # C1765

AIHA Environmental Lead and Industrial Hygiene ACCREDITED LABORATORY

Total Metals

Client: NVL Field Services Division
Address: 4708 Aurora Ave. N.
Seattle, WA 98103

Attention: Mr. Munaf Khan
Project Location: 3317 3rd Ave South, Seattle, WA 98134

Batch #: 1409906.00
Matrix: Bulk
Method: EPA 6010 / 7471 (Hg)
Client Project #: 2012-494
Date Received: 6/13/2014
Samples Received: 1
Samples Analyzed: 1

Lab ID	Client Sample #	Elements	Sample wt (g)	RL mg / kg	Results in mg / kg	Results in ppm
14061273	61114-MG-B-1	Silver (Ag)	0.2362	17.0	< 17.0	< 17.0
		Arsenic (As)	0.2362	17.0	< 17.0	< 17.0
		Cadmium (Cd)	0.2362	17.0	< 17.0	< 17.0
		Chromium (Cr)	0.2362	17.0	27.0	27.0
		Mercury (Hg)	0.2362	0.9	< 0.8	< 0.8
		Lead (Pb)	0.2362	17.0	< 17.0	< 17.0
		Copper (Cu)	0.2362	17.0	2500.0	2500.0
		Nickel (Ni)	0.2362	17.0	26.0	26.0
		Zinc (Zn)	0.2362	17.0	55.0	55.0

Sampled by: Client
Analyzed by: Fatima Khan
Reviewed by: Nick Ly

Date Analyzed: 06/16/2014
Date Issued: 06/16/2014

for Nick Ly, Technical Director

mg/ kg = Milligrams per kilogram
ppm = Parts per million

RL = Reporting Limit
'<' = Below the reporting Limit

Note : Method QC results are acceptable unless stated otherwise.
Unless otherwise indicated, the condition of all samples was acceptable at time of receipt.

Bench Run No: 34-0616-6

NVL Laboratories, Inc.
4708 Aurora Ave N, Seattle, WA 98103
Tel: 206.547.0100 Emerg. Cell: 206.914.4646
1.888.NVL.LABS (685.5227) www.nvllabs.com

CHAIN of CUSTODY SAMPLE LOG

NVL Batch ID
1409906

Client NVL Laboratories Inc
Street 4708 Aurora Ave N
Seattle, WA 98103
Project Manager Munaf Khan
Project Location 3317 3rd Avenue South
Seattle, WA 98134

NVL Batch Number
Client Job Number 2012-494
Total Samples 1
Turn Around Time ☐ 1-Hr ☐ 2-Hrs ☐ 4-Hrs ☐ 8-Hrs ☐ 12-Hrs ☒ 24-Hrs ☐ 2 ☐ 3 ☐ 4 ☐ 5 ☐ 6-10
Please call for TAT less than 24 Hrs
Email address

Phone: (206) 447-0263 **Fax:** (206) 447-0299

☐ **Asbestos Air** ☐ PCM (NIOSH 7400) ☐ TEM (NIOSH 7402) ☐ TEM (AHERA) ☐ TEM (EPA Level II) ☐ Other
☐ **Asbestos Bulk** ☐ PLM (EPA/600/R-93/116) ☐ PLM (EPA Point Count) ☐ PLM (EPA Gravimetry) ☐ TEM BULK
☐ **Mold/Fungus** ☐ Mold Air ☐ Mold Bulk ☐ **Rotometer Calibration**

METALS: ☒ Total Metals ☐ TCLP ☐ Cr 6
Det. Limit: ☐ FAA (ppm) ☒ ICP (ppm) ☐ GFAA (ppb)
Matrix: ☐ Air Filter ☐ Drinking water ☐ Dust/wipe (Area) ☐ Soil ☒ Paint Chips in % ☐ Paint Chips in cm
RCRA Metals: ☐ All 8 ☒ Arsenic (As) ☐ Barium (Ba) ☒ Cadmium (Cd) ☒ Chromium (Cr) ☒ Lead (Pb) ☒ Mercury (Hg)
Other Metals: ☐ All 3 ☒ Copper (Cu) ☒ Nickel (Ni) ☒ Zinc (Zn) ☒ SILVER (Ag)

☐ **Other Types of Analysis** ☐ Fiberglass ☐ Silica ☐ Nuisance Dust ☐ Respirable Dust ☐ Other (Specify) ____

Condition of Package: ☐ Good ☐ Damaged (no spillage) ☐ Severe damage (spillage)

Seq. #	Lab ID	Client Sample Number	Comments	A/R
1		61114-MG-B-1	BLASTING MEDIA	
2				
3				
4				
5				
6				
7				
8				
9				
10				
11				
12				
13				
14				
15				

	Print Below	Sign Below	Company	Date	Time
Sampled by	Marcus Gladden	[signature]	NVL LABS	6/11/14	14:00
Relinquished by	↓	↓	↓	6/12/14	13:15
Received by	Shaista Khan	[signature]	NVL	6/13/14	1315
Analyzed by	[signature]	[signature]	Nvllabs	6/16/14	11:20
Results Called by					
Results Faxed by					

Special Instructions: Unless requested in writing, all samples will be disposed of two (2) weeks after analysis.
Results report to

June 17, 2014

NVL LABS
INDUSTRIAL HYGIENE SERVICES
Laboratory | Management | Training

Doug Lansing
Rainier Commons, LLC
918 S. Horton Street, Suite 101
Seattle, WA 98134

RE: Organics Analysis, NVL Batch # 1410074.00

Dear Mr. Lansing,

Enclosed please find test results for the samples submitted to our laboratory for analysis. Preparation and analysis of these samples were conducted for the presence of organic compounds using instruments specified in accordance with EPA, NIOSH and other published methods.

Test results for bulk sample are usually expressed in milligrams per kilogram (mg/Kg) and/or parts per million (ppm). Air samples are usually reported in milligrams per cubic meter (mg/m3). Dust wipe samples are expressed in micrograms per 100 square centimeters (ug/cm2). The reported test results pertain only to items tested and are not blank corrected.

For recent regulation updates pertaining to current regulatory levels or permissable exposure limits, please call your local regulatory agencies for more details.

This report is considered highly confidential and will not be released without your approval. Samples are archived for two weeks following analysis. Samples that are not retrieved by the client are discarded after two weeks.

Thank you for using our laboratory services. Please do not hesitate to call if there is anything further we can assist you with.

Sincerely,

Nick Ly, Technical Director

Enc.: Sample Results

1.888.NVL.LABS
1.888.(685.5227)
www.nvllabs.com

NVL Laboratories, Inc.
4708 Aurora Ave N, Seattle, WA 98103
p 206.547.0100 | f 206.634.1936

NVL Laboratories, Inc.
4708 Aurora Ave N, Seattle, WA 98103
p 206.547.0100 | f 206.634.1936 | www.nvllabs.com

Analysis Report
Polychlorinated Biphenyls (PCBs)

NVL LABS INDUSTRIAL HYGIENE SERVICES

Client: Rainier Commons, LLC
Address: 918 S. Horton Street, Suite 101
Seattle, WA 98134

Attention: Mr. Doug Lansing
Project Location: 3100 Airport Way S. Seattle,WA 98134

NVL Batch No. 1410074.00
Method No.: EPA 8082
Client Project #: 2012-494
Date Received: 6/16/2014
Matrix: Bulk
Samples Received: 1
Samples Analyzed: 1

Lab Sample ID:	14062793			
Client Sample ID:	61614DLPCB			
Sample Description:	White Cementious Sample from Bldg. 13, SW Corner			
Sample Weight (g)	0.95012			
PCB Type	mg/Kg(ppm)			
Aroclor 1016	ND			
Aroclor 1221	ND			
Aroclor 1232	ND			
Aroclor 1242	ND			
Aroclor 1248	ND			
Aroclor 1254	8900.0			
Aroclor 1260	5000.0			
Total: PCB Concentration	13900.0			
Reporting Limit (RL)	2100.0			

Remarks: mg/Kg = Milligrams per kilograms
ppm = Parts per million by weight

ND = None Detected (less than RL)
<RL = Below the reporting limit of instrument

Sampled by: Client
Analyzed by: Evelyn Ahulu **Date:** 06/17/2014
Reviewed by: Nick Ly **Date:** 06/17/2014

Nick Ly, Technical Director

RCLLC 0007129

NVL Laboratories, Inc.
4708 Aurora Ave N, Seattle, WA 98103
Tel: 206.547.0100 Emerg.Pager: 206.344.1878
Fax: 206.634.1936 1.888.NVL.LABS (685.5227)

CHAIN of CUSTODY SAMPLE LOG

NVL Batch ID 1410074

9185. Horton

Client: RAINIER COMMONS
Street: 3100 AIRPORT WAY S.
SEATTLE, WA 98134
Project Manager: DOUG LANSING
Project Location:

NVL Batch Number:
Client Job Number: 202-444
Total Samples: ONE
Turn Around Time: ☐ 1-Hr ☑ 24-Hrs ☐ 4 Days ☐ 2-Hrs ☐ 2 Days ☐ 5 Days ☐ 4-Hrs ☐ 3 Days ☐ 6 to 10 Days
Please call for TAT less than 24 Hrs
Email address: LANSINGHOMES@ADL.COM

Phone: 206-963-6656 Fax: Home

☐ Asbestos Air	☐ PCM (NIOSH 7400)	☐ TEM (NIOSH 7402)	☐ TEM (AHERA)	☐ TEM (EPA Level II)	☐ Other	
☐ Asbestos Bulk	☐ PLM (EPA/600/R-93/116)	☐ PLM (EPA Point Count)	☐ PLM (EPA Gravimetry)	☐ TEM Bulk		

METALS	Det. Limit	Matrix		RCRA Metals		Other Metals
☐ Total Metals	☐ ppm (AAS)	☐ Air Filter	☐ Paint Chips	☐ Arsenic (As)	☐ All 8	☐ All 3
☐ TCLP	☐ ppb (GFAA)	☐ Drinking water	☐ Paint Chips (Area)	☐ Barium (Ba)	☐ Lead (Pb)	☐ Copper (Cu)
		☐ Dust/wipe	☐ Waste Water	☐ Cadmium (Cd)	☐ Mercury (Hg)	☐ Nickel (Ni)
		☐ Soil		☐ Chromium (Cr)	☐ Selenium (Se)	☐ Zinc (Zn)
					☐ Silver (Ag)	

☑ Other Types of Analysis	☐ Fiberglass ☐ Silica	☐ Nuisance Dust ☐ Respirable Dust	☑ Other (Specify)	PCBs

Condition of Package: ☐ Good ☐ Damaged (no spillage) ☐ Severe damage (spillage)

Seq. #	Lab ID	Client Sample Number	Comments	A/R
1		61614 DL PCB	WHITE CEMENTITIOUS SAMPLE	
2			FROM BLDG 13, SW CORNER	
3				
4				
5				
6				
7				
8				
9				
10				
11				
12				
13				
14				
15				

	Print Below	Sign Below	Company	Date	Time
Sampled by	DOUG LANSING		RAINIER COMMONS	6-13	1500
Relinquished by	DOUG LANSING		"	6-16	1615
Received by			NVL	6/16/14	1615 (1658)
Analyzed by	Evelyn Atmadja		NVL	6/17/14	16:30
Results Called by					
Results Faxed by					

Special Instructions: Unless requested in writing, all samples will be disposed of two (2) weeks after analysis.

NVL Laboratories, Inc.
4708 Aurora Ave N, Seattle, WA 98103
p 206.547.0100 | f 206.634.1936 | www.nvllabs.com

Analysis Report
Polychlorinated Biphenyls (PCBs)

NVL LABS INDUSTRIAL HYGIENE SERVICES

Client: NVL Field Services Division
Address: 4708 Aurora Ave. N.
Seattle, WA 98103

Attention: Mr. Marcus Gladden
Project Location: 3100 Airport Way South Seattle,WA 98134

NVL Batch #: 1418022.00
Method No.: EPA 8082
Client Project #: 2012-494
Date Received: 10/9/2014
Matrix: Bulk
Samples Received: 2
Samples Analyzed: 2

Lab Sample ID:	14128826	14128827		
Client Sample ID:	10914-BULK-1	10914-BULK-2		
Sample Description:	Blue Paint, Bldg. 13 SW	Sandstone, Bldg. 10 W		
Sample Weight (g)	1.0403	2.0156		
PCB Type	mg/Kg(ppm)	mg/Kg(ppm)		
Aroclor 1016	ND	ND		
Aroclor 1221	ND	ND		
Aroclor 1232	ND	ND		
Aroclor 1242	ND	ND		
Aroclor 1248	ND	ND		
Aroclor 1254	100.00	2.8		
Aroclor 1260	29.00	1.5		
Total: PCB Concentration	129.0	4.3		
Reporting Limit (RL)	19.0	1.0		

Remarks: mg/Kg = Milligrams per kilogram
ppm = Parts per million by weight
ND = None Detected (less than RL)
<RL = Below the reporting limit of instrument

Sampled by: Client
Analyzed by: Shalini Patel **Date:** 10/10/2014
Reviewed by: Nick Ly **Date:** 10/10/2014

Nick Ly, Technical Director

RCLLC 0007131

NVL Laboratories, Inc.
4708 Aurora Ave N, Seattle, WA 98103
p 206.547.0100 | f 206.634.1936 | www.nvllabs.com

CHAIN of CUSTODY SAMPLE LOG

1418022

Client NVL Laboratories Inc
Street 4708 Aurora Ave N
Seattle, WA 98103
Project Manager Munaf Khan
Project Location 3100 Airport Way South
Seattle, WA 98134

NVL Batch Number
Client Job Number 2012-494
Total Samples 2
Turn Around Time ☐ 1 Hr ☐ 6 Hrs ☐ 3 ☐ 10 ☐ 2 Hrs ☒ 1 ☐ 4 ☐ 4 Hrs ☐ 2 ☐ 5
Please call for TAT less than 24 Hrs
Email address

Phone: (206) 447-0263 **Fax:** (206) 447-0299

☐ Asbestos Air	☐ PCM (NIOSH 7400)	☐ TEM (NIOSH 7402)	☐ TEM (AHERA)	☐ TEM (EPA Level II)	☐ Other
☐ Asbestos Bulk	☐ PLM (EPA/600/R-93/116)	☐ PLM (EPA Point Count)	☐ PLM (EPA Gravimetry)	☐ TEM BULK	
☐ Mold/Fungus	☐ Mold Air	☐ Mold Bulk	☐ Rotometer Calibration		

METALS	Det. Limit	Matrix		RCRA Metals		Other Metals
☐ Total Metals	☐ FAA (ppm)	☐ Air Filter	☐ Soil	☐ Arsenic (As)	☐ All 8	☐ All 3
☐ TCLP	☐ ICP (ppm)	☐ Drinking water	☐ Paint Chips in %	☐ Barium (Ba)	☐ Chromium (C	☐ Copper (Cu)
☐ Cr 6	☐ GFAA (ppb)	☐ Dust/wipe (Area)	☐ Paint Chips in cr	☐ Cadmium (Cd)	☐ Lead (Pb)	☐ Nickel (Ni)
					☐ Mercury (Hg)	☐ Zinc (Zn)

Other Types of Analysis ☐ Fiberglass ☐ Nuisance Dust ☒ Other (Specify) PCB's - Bulk
☐ Silica ☐ Respirable Dust

Condition of Package: ☐ Good ☐ Damaged (no spillage) ☐ Severe damage (spillage)

Seq. #	Lab ID	Client Sample Number	Comments	A/R
1		10914-Bulk-1	BLUE PAINT, BLDG 13 SW	
2		↓ 2	SANDSTONE, BLDG 10 W	
3				
4				
5				
6				
7				
8				
9				
10				
11				
12				
13				
14				
15				

	Print Below	Sign Below	Company	Date	Time
Sampled by	MARCUS GLADDEN		NVL LABS	10/9/14	11:30
Relinquished by	↓	↓	↓	↓	14:15
Received by	Midori Kato		NVL	10/9/14	1415
Analyzed by					
Results Called by					
Results Faxed by					

Special Instructions: Unless requested in writing, all samples will be disposed of two (2) weeks after analysis.
Results report to

NVL Laboratories, Inc.
4708 Aurora Ave N, Seattle, WA 98103
p 206.547.0100 | f 206.634.1936 | www.nvllabs.com

Analysis Report
Polychlorinated Biphenyls (PCBs)

NVL LABS INDUSTRIAL HYGIENE SERVICES

Client: Rainier Commons, LLC
Address: 918 S. Horton Street, Suite 101
Seattle, WA 98134

Attention: Mr. Doug Lansing
Project Location: 3100 Airport Way S. Seattle, WA 98134

NVL Batch #: 1418211.00
Method No.: EPA 8082
Client Project #: 2012-494
Date Received: 10/13/2014
Matrix: Bulk
Samples Received: 1
Samples Analyzed: 1

Lab Sample ID:	14129938			
Client Sample ID:	100814DLPCB			
Sample Description:	Silver material on brick			
Sample Weight (g)	2.1487			
PCB Type	mg/Kg(ppm)			
Aroclor 1016	ND			
Aroclor 1221	ND			
Aroclor 1232	ND			
Aroclor 1242	ND			
Aroclor 1248	ND			
Aroclor 1254	5.6			
Aroclor 1260	1.4			
Total: PCB Concentration	7.0			
Reporting Limit (RL)	0.9			

Remarks: mg/Kg = Milligrams per kilogram
ppm = Parts per million by weight
ND = None Detected (less than RL)
<RL = Below the reporting limit of instrument

Sampled by: Client
Analyzed by: Shalini Patel
Date: 10/14/2014

DRAFT

RCLLC 0007133

NVL Laboratories, Inc.
4708 Aurora Ave N, Seattle, WA 98103
Tel: 206.547.0100 Emerg.Cell: 206.914.4646
Fax: 206.634.1936 1.888.NVL.LABS (685.5227)

CHAIN of CUSTODY SAMPLE LOG

1418211

Client Rainier Commons, LLC
Street 918 S. Horton Street, Suite 101
Seattle, WA 98134

NVL Batch Number
Client Job Number 2012-494
Total Samples ONE
Turn Around Time ☐ 1-Hr ☐ 2-Hrs ☐ 4-Hrs ☐ 8-Hrs ☐ 12-Hrs ☒ 24-Hrs ☐ 2 ☐ 3 ☐ 4 ☐ 5 ☐ 6-10

Please call for TAT less than 24 Hrs

Project Manager Mr. Doug Lansing
Project Location 3100 Airport Way S. Seattle,WA 98134

Email address lansinghomes@aol.com

Phone: (206) 447-0263 **Fax:** (206) 447-0299 **Cell** (206) 963-6656

☐ Asbestos Air	☐ PCM (NIOSH 7400)	☐ TEM (NIOSH 7402)	☐ TEM (AHERA)	☐ TEM (EPA Level II)	☐ Other
☒ Asbestos Bulk	☐ PLM (EPA/600/R-93/116)	☐ PLM (EPA Point Count)	☐ PLM (EPA Gravimetry)	☐ TEM BULK	
☐ Mold/Fungus	☐ Mold Air	☐ Mold Bulk	☐ Rotometer Calibration		

METALS	Det. Limit	Matrix		RCRA Metals		Other Metals
☐ Total Metals	☐ FAA (ppm	☐ Air Filter	☐ Soil	☐ Arsenic (As)	☐ All 8	☐ All 3
☐ TCLP	☐ ICP (ppm)	☐ Drinking water	☐ Paint Chips in %	☐ Barium (Ba)	☐ Chromium (C	☐ Copper (Cu)
☐ Cr 6	☐ GFAA (ppl	☐ Dust/wipe (Area)	☐ Paint Chips in cr	☐ Cadmium (Cd)	☐ Lead (Pb)	☐ Nickel (Ni)
					☐ Mercury (Hg)	☐ Zinc (Zn)

☐ Other Types of Analysis	☐ Fiberglass ☐ Silica	☐ Nuisance Dust ☐ Respirable Dust	☒ Other (Specify)	PCB

Condition of Package: ☐ Good ☐ Damaged (no spillage) ☐ Severe damage (spillage)

Seq. #	Lab ID	Client Sample Number	Comments (e.g Sample are, Sample Volume, etc)	A/R
1		100814 DL PCB	REMOVED BY HAND FROM SW WALL	
2			BLDG 13. SILVER MATERIAL	
3			ON BRICK	
4				
5				
6				
7				
8				
9				
10				
11				
12				
13				
14				
15				

	Print Below	Sign Below	Company	Date	Time
Sampled by	D. LANSING		R.C.	10/8/14	1510
Relinquished by				10/13/14	14:00
Received by				10/13/14	1400
Analyzed by					
Results Called by					
Results Faxed by					

Special Instructions: Unless requested in writing, all samples will be disposed of two (2) weeks after analysis.

NVL Laboratories, Inc.
4708 Aurora Ave N, Seattle, WA 98103
p 206.547.0100 | f 206.634.1936 | www.nvllabs.com

Analysis Report
Polychlorinated Biphenyls (PCBs)

NVL LABS INDUSTRIAL HYGIENE SERVICES

Client: Rainier Commons, LLC
Address: 918 S. Horton Street, Suite 101
Seattle, WA 98134

Attention: Mr. Doug Lansing
Project Location: 3100 Airport Way S. Seattle,WA 98134

NVL Batch No. 1416397.00
Method No.: EPA 8082
Client Project #: 2012-494
Date Received: 9/16/2014
Matrix: Bulk
Samples Received: 1
Samples Analyzed: 1

Lab Sample ID:	14121456			
Client Sample ID:	91614DLPCB1			
Sample Description:	Dust/Dirt found @ South Window Sill-South Window Bldg. 10-300	← 10-300		
Sample Weight (g)	1.4158			
PCB Type	mg/Kg(ppm)			
Aroclor 1016	ND			
Aroclor 1221	ND			
Aroclor 1232	ND			
Aroclor 1242	ND			
Aroclor 1248	ND			
Aroclor 1254	ND			
Aroclor 1260	ND			
Total: PCB Concentration	ND			
Reporting Limit (RL)	1.4			

Remarks: mg/Kg = Milligrams per kilograms
ppm = Parts per million by weight

ND = None Detected (less than RL)
<RL = Below the reporting limit of instrument

Sampled by: Client
Analyzed by: Evelyn Ahulu **Date:** 09/17/2014
Reviewed by: Nick Ly **Date:** 09/17/2014

Nick Ly, Technical Director

NVL Laboratories, Inc.
4708 Aurora Ave N, Seattle, WA 98103
p 206.547.0100 | f 206.634.1936 | www.nvllabs.com

Analysis Report
Polychlorinated Biphenyls (PCBs)

NVL LABS INDUSTRIAL HYGIENE SERVICES

Client: Rainier Commons, LLC
Address: 918 S. Horton Street, Suite 101
Seattle, WA 98134

Attention: Mr. Doug Lansing
Project Location: RC - Airport Way S.

NVL Batch No. 1415402.00
Method No.: EPA 8082
Client Project #: A14067
Date Received: 9/2/2014
Matrix: Bulk
Samples Received: 1
Samples Analyzed: 1

Lab Sample ID:	14116543			
Client Sample ID:	#1 Scaffold Plank Cores	BLDG 13		
Sample Description:	Scaffold plank cores			
Sample Weight (g)	3.2942			
PCB Type	mg/Kg(ppm)			
Aroclor 1016	ND			
Aroclor 1221	ND			
Aroclor 1232	ND			
Aroclor 1242	ND			
Aroclor 1248	ND			
Aroclor 1254	ND			
Aroclor 1260	ND			
Total: PCB Concentration	ND			
Reporting Limit (RL)	0.6			

Remarks: mg/Kg = Milligrams per kilograms
ppm = Parts per million by weight

ND = None Detected (less than RL)
<RL = Below the reporting limit of instrument

Sampled by: Client
Analyzed by: Evelyn Ahulu **Date:** 09/02/2014
Reviewed by: Nick Ly **Date:** 09/02/2014

Nick Ly, Technical Director

Preparation of these samples were conducted in accordance with EPA Method 3546 or other published test methods as noted in this report. Unless stated otherwise, the condition of all samples was acceptable at time of receipt. Reported sample results are based on dry weight and method QC results are acceptable unless stated otherwise. If samples were not collected by NVL personnel, then the accuracy of the results is limited by the methodology and acuity of the sample collector. This report shall not be reproduced except in full, without written approval of NVL Laboratories, Inc.. Responsibility for interpretation of the reported data rests with the client.

NVL Laboratories, Inc.
4708 Aurora Ave N, Seattle, WA 98103
p 206.547.0100 | f 206.634.1936 | www.nvllabs.com

Analysis Report
Polychlorinated Biphenyls (PCBs)

NVL LABS INDUSTRIAL HYGIENE SERVICES

Client: Rainier Commons, LLC
Address: 918 S. Horton Street, Suite 101
Seattle, WA 98134

Attention: Mr. Doug Lansing
Project Location: 3100 Airport Way S. Seattle, WA 98134

NVL Batch No. 1416152.00
Method No.: EPA 8082
Client Project #: 2012-494
Date Received: 9/12/2014
Matrix: Bulk
Samples Received: 3
Samples Analyzed: 3

Lab Sample ID:	14120205	14120206	14120207	BLDG 10 & 11
Client Sample ID:	91214PCB1	91214PCB2	91214PCB3	
Sample Description:	Scaffold Core Bldg. 11	Scaffold Core Bldg. 10	Poly and Tyvek Bldg. 11	
Sample Weight (g)	2.2289	2.0478	9.1725	
PCB Type	mg/Kg(ppm)	mg/Kg(ppm)	mg/Kg(ppm)	
Aroclor 1016	ND	ND	ND	
Aroclor 1221	ND	ND	ND	
Aroclor 1232	ND	ND	ND	
Aroclor 1242	ND	ND	ND	
Aroclor 1248	ND	ND	ND	
Aroclor 1254	ND	ND	ND	
Aroclor 1260	ND	ND	ND	
Total: PCB Concentration	ND	ND	ND	
Reporting Limit (RL)	0.9	1.0	0.2	

Remarks: mg/Kg = Milligrams per kilograms
ppm = Parts per million by weight
ND = None Detected (less than RL)
<RL = Below the reporting limit of instrument

Sampled by: Client
Analyzed by: Evelyn Ahulu
Date: 09/12/2014

DRAFT

Preparation of these samples were conducted in accordance with EPA Method 3546 or other published test methods as noted in this report. Unless stated otherwise, the condition of all samples was acceptable at time of receipt. Reported sample results are based on dry weight and method QC results are acceptable unless stated otherwise. If samples were not collected by NVL personnel, then the accuracy of the results is limited by the methodology and acuity of the sample collector. This report shall not be reproduced except in full, without written approval of NVL Laboratories, Inc.. Responsibility for interpretation of the reported data rests with the client.

NVL Laboratories, Inc.
4708 Aurora Ave N, Seattle, WA 98103
p 206.547.0100 | f 206.634.1936 | www.nvllabs.com

Analysis Report
Polychlorinated Biphenyls (PCBs)

NVL LABS INDUSTRIAL HYGIENE SERVICES

Client: Rainier Commons, LLC
Address: 918 S. Horton Street, Suite 101
Seattle, WA 98134

Attention: Mr. Doug Lansing
Project Location: Rainier Commons

NVL Batch No. 1415463.00
Method No.: EPA 8082
Client Project #: A14067
Date Received: 9/2/2014
Matrix: Bulk
Samples Received: 1
Samples Analyzed: 1

Lab Sample ID:	14116857			
Client Sample ID:	001	BLDG 13		
Sample Description:	Wall poly and suits			
Sample Weight (g)	9.9555			
PCB Type	mg/Kg(ppm)			
Aroclor 1016	ND			
Aroclor 1221	ND			
Aroclor 1232	ND			
Aroclor 1242	ND			
Aroclor 1248	ND			
Aroclor 1254	31.0			
Aroclor 1260	4			
Total: PCB Concentration	35.0			
Reporting Limit (RL)	2.0			

Remarks: mg/Kg = Milligrams per kilograms
ppm = Parts per million by weight
ND = None Detected (less than RL)
<RL = Below the reporting limit of instrument

Sampled by: Client
Analyzed by: Evelyn Ahulu
Date: 09/03/2014

DRAFT

Preparation of these samples were conducted in accordance with EPA Method 3546 or other published test methods as noted in this report. Unless stated otherwise, the condition of all samples was acceptable at time of receipt. Reported sample results are based on dry weight and method QC results are acceptable unless stated otherwise. If samples were not collected by NVL personnel, then the accuracy of the results is limited by the methodology and acuity of the sample collector. This report shall not be reproduced except in full, without written approval of NVL Laboratories, Inc.. Responsibility for interpretation of the reported data rests with the client.